

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE, SPRING
VALLEY BRANCH; JULIO CLERVEAUX;
CHEVON DOS REIS; ERIC GOODWIN; JOSE
VITELIO GREGORIO; DOROTHY MILLER;
HILLARY MOREAU; and WASHINGTON
SANCHEZ,

Plaintiffs,

- against -

EAST RAMAPO CENTRAL SCHOOL DISTRICT,

Defendants.

[PROPOSED] ORDER
No. 17-CV-8943 (CS) (JCM)

**[PROPOSED] ORDER GRANTING LETTER MOTION TO SEAL EXHIBIT F TO THE
PLAINTIFFS' LETTER MOTION, DATED OCTOBER 25, 2018**

By letter dated November 1, 2018 (the "Letter Motion"), the Plaintiffs moved for an order authorizing them to file under seal Exhibit F to the Plaintiff's Letter Motion to compel non-party Yehuda Oshry to produce documents and provide testimony, dated October 25, 2018 (the "Letter Motion to Compel"); and due and proper notice of the Letter Motion having been provided; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Letter Motion is appropriate pursuant to the Stipulated Protective Order dated February 6, 2018, and that the legal and factual bases set forth in the Letter Motion establish just cause for the relief granted here;

IT IS HEREBY ORDERED THAT:

1. The Letter Motion is GRANTED;
2. Plaintiffs are authorized to permanently file Exhibit F to the Plaintiffs' Letter Motion to Compel under seal; and

3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

Dated: New York, New York

_____, 2018

The Honorable Judith C. McCarthy